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17 RUTHIA HE

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 UNITED STATES OF AMERICA,

22 CASE NO. 3:24-cr-00329-CRB

23 Plaintiff,

24 **AMENDED [PROPOSED] ORDER**  
25 **GRANTING DEFENDANT'S MOTION TO**  
26 **COMPEL DISCLOSURE OF *BRADY*,**  
27 ***GIGLIO*, AND RULE 16 MATERIALS**

28 v.  
RUTHIA HE, A/K/A RUJIA HE, and  
DAVID BRODY,

Defendants.

1                   **[PROPOSED] ORDER**

2       Before the Court is Defendant Ruthia He’s Motion to Compel (the “Motion”). The  
3       Court, having considered Defendant’s Motion, all papers filed in support thereof and in  
4       opposition thereto, and the argument of counsel, concludes that Defendant’s Motion should be  
5       granted pursuant to Federal Rule of Criminal Procedure 16, *Brady v. Maryland*, 373U.S. 83  
6       (1963), *Giglio v. United States*, 405 U.S. 150 (1982), and their progeny.

7       Accordingly, it is hereby **ORDERED** that Defendant’s Motion is **GRANTED** in part  
8       and **DENIED** in part. The Government shall **PROVIDE** the following:

- 9       1.       Disclose the total amount it has paid its summary witness, Mr. Michael J.  
10      Petron, over the last five years; and
- 11      2.       Disclose the hourly rates its expert, Dr. Goodman, charges patients in his  
12      private practice, to contrast the amounts the Government is paying him here.

13                   **IT IS SO ORDERED.**

14                   Dated: September 23, 2025



15                   Hon. Charles R. Breyer  
16                   United States District Judge